

April 23, 2018

Gwen Yoshimura, Manager  
Air Quality Analysis Office, Air Division  
U.S. Environmental Protection Agency  
Region 9  
75 Hawthorne Street, AIR-7  
San Francisco, California 94105

Dear Ms. Yoshimura:

The California Air Resources Board requests that the U.S. Environmental Protection Agency (U.S. EPA) concur that the documents accompanying this request support the flagging of PM<sub>10</sub> exceedances in the Imperial County Air Pollution Control District as natural events due to high winds. The values recorded at the affected monitors have implications on the PM<sub>10</sub> nonattainment designation of Imperial County.

The PM<sub>10</sub> exceedances occurred on:

- March 26, 2014;
- May 18, 2015;
- May 21-22, 2015; and
- January 31-February 1, 2016.


Unusually high PM<sub>10</sub> concentrations, exceeding the 24-hour federal standard of 150 µg/m<sup>3</sup>, were recorded at various monitoring sites in the Imperial County Air Pollution Control District on the dates listed above. The analyses and data presented in the accompanying documents show that without the high winds and entrained dust on each of these occurrences, concentrations measured at the monitoring sites would have been below the federal standard.

On March 22, 2007, the U.S. EPA adopted the *Treatment of Data Influenced by Exceptional Events* rule that allows data to be flagged and excluded from consideration by U.S. EPA when making decisions related to the attainment status of an area (72 FR 13560). This rule, which was revised on October 3, 2016 (81 FR 68216), requires that states submit documentation to support the initial flagging to the appropriate U.S. EPA Regional Office.

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If you have any questions regarding the enclosed documentation please contact Mr. Webster Tasat, Manager, Central Valley Air Quality Planning Section, at (916) 323-4950 or via email at [webster.tasat@arb.ca.gov](mailto:webster.tasat@arb.ca.gov).

Sincerely,

  
Sylvia Vanderspek, Chief  
Air Quality Planning Branch  
Air Quality Planning and Science Division

Enclosure

cc: Mr. Matt Dessert  
Air Pollution Control Officer  
Imperial County Air Pollution Control District  
150 South Ninth Street  
El Centro, California 92243-2850

Mr. Michael Flagg  
Air Quality Analysis Office  
U.S. Environmental Protection Agency  
Region 9  
75 Hawthorne Street, AIR-7  
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Mr. Webster Tasat, Manager  
Central Valley Air Quality Planning Section  
Air Quality Planning and Science Division